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December 13, 2022

VIA ECF

Hon. Ann M. Donnelly
225 Cadman Plaza East
Courtroom 4GN
Brooklyn, New York 11201

Re: Jennifer D. Araoz vs. The New Albany Company LLC, et al.
U.S. District Court, Eastern District of New York
Case No. 1:22-cv-00125

Dear Judge Donnelly,

As your Honor is likely be aware, Magistrate Judge Robert M. Levy issued an Order on November 21, 2022, resolving Defendants' motion to disqualify Plaintiff's undersigned counsel in Plaintiff's favor. (Docket No. 32). Therefore, and as discussed at the September 7, 2022 status conference, we are hereby requesting a briefing schedule to file an amended complaint which we believe we rectify the deficiencies in the pleadings that your Honor brought to our attention. Once our amended complaint is filed, we would be ready to proceed with opposing Defendant's anticipated motion to dismiss.

Sincerely,

/s/ Robert J. Hantman, Esq.

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